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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of

SOUTHWESTERN BELL
TELEPHONE COMPANY

Petition for Rulemaking
To Establish a Funding
Mechanism for Interstate
Operator Assistance for
the Deaf

RM No. 8585

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COMMENTS

On December 29, 1994, Southwestern Bell Telephone Company (SWBT) requested that the Commission initiate a rulemaking proceeding to establish a funding mechanism to recover the costs for providing interstate Operator Assistance for the Deaf (OAD).¹

Pursuant to the Commission's Public Notice,² the National Exchange Carrier Association, Inc.³ (NECA) is filing these comments regarding SWBT's Petition for Rulemaking.

OAD is a service for hearing or speech-impaired customers who use text telephones or other non-voice terminal devices to communicate with other hearing or speech-impaired customers over

¹ Southwestern Bell Telephone Company, Establishment of a Funding Mechanism for Interstate Operator Assistance for the Deaf, Petition for Rulemaking at 1 (filed December 29, 1994) (Petition).

² Public Notice, Report No. 2058, Office of Public Affairs, Public Information and Reference Services, Petitions for Rulemaking Filed (February 14, 1995).

³ NECA is a not-for-profit membership association of telephone companies that serve over 1400 study areas throughout the United States, and in Puerto Rico, Micronesia and the U.S. Virgin Islands.

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the Public Switched Network.⁴ OAD involves hearing or speech-impaired customer devices on both ends of any particular call.⁵ Petitioner states that the primary need for OAD arises when hearing or speech-impaired customers want to bill a call to a third number, or to place a collect call.⁶ Each of these alternate billing services requires the assistance of operators to collect and validate billing information.⁷ OAD is also needed for other operator-provided assistance services such as directory assistance, assistance with receipt of recorded announcements, and credit for service difficulties.⁸

SWBT requests that the Commission establish a rulemaking to create a funding mechanism to recover interstate OAD costs. In addition, SWBT recommends that the interstate fund that is established be administered by a single interstate fund administrator.⁹ SWBT further states that NECA has extensive experience in administering similar funds and would be a logical candidate for the OAD fund.¹⁰

If the Commission determines that a funding mechanism is needed and establishes such a funding mechanism for Interstate Operator Assistance for the Deaf, NECA is willing to administer the fund. NECA has the experience to administer an interstate OAD fund as evidenced by its capability to administer other funds, such as the Telecommunications Relay Services (TRS) fund.

⁴ Petition at 1. These hearing or speech impaired customers use communication devices equipped with alpha/numeric keyboards which transmit and receive messages and visual displays.

⁵ Id.

⁶ Id. at 2.

⁷ Id.

⁸ Id.

⁹ Id. at 3.

¹⁰ Id.

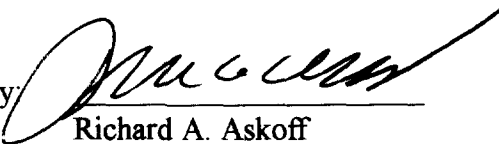
Recently, NECA filed a proposal to be reappointed as TRS administrator.¹¹ In that proceeding, NECA received support from a broad cross-section of the industry regarding its reappointment.¹² NECA's successful TRS performance includes its establishment of methods and procedures for identifying TRS provider costs, its development of compensation formulas, its implementation of Commission procedures for fund collection, and its efficient performance in distributing TRS funds to providers.¹³

If the Commission, upon completion of a rulemaking process, establishes a funding mechanism to recover the costs of providing interstate Operator Assistance for the Deaf, NECA would be willing to administer such a fund pursuant to Commission's rules.

Respectfully submitted,

NATIONAL EXCHANGE CARRIER
ASSOCIATION, INC.

By



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March 16, 1995


¹¹ TRS Fund Administration, CC Docket No. 90-571, NECA Proposal for Reappointment as TRS Administrator and Comments (filed March 6, 1995) (NECA Proposal).

¹² See, generally, TRS Fund Administration, CC Docket No. 90-571, Comments by Sprint, National Association of Regulatory Utility Commissioners (NARUC), National Telephone Cooperative Association (NTCA), National Association for State Relay Administration (NASRA), Telecommunication Access for Communication Impaired Persons (TACIP) Board, Telecommunications for the Deaf, Inc. (TDI) and Hamilton Telephone Company (filed March 6, 1995).

¹³ NECA Proposal at 4-5.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Comments was served this 16th day of March 1995, by mailing copy thereof by United States Mail, first class postage paid, to the persons listed below.

By 
Donna A. DiMartino

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